

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA, :  
Plaintiff, : Case No. 3:18-CR-186  
vs. : JUDGE THOMAS M. ROSE  
BRIAN HIGGINS :  
Defendant. :  
\_\_\_\_\_  
\_\_\_\_\_

**MOTION TO WITHDRAW AS COUNSEL AND REQUEST FOR FARETTA HEARING**

---

Now comes undersigned Counsel, Tamara Sack and Paul Laufman, who informs the Court that Defendant, Brian Higgins, has notified us that he wishes to terminate our representation and proceed *Pro Se*.

Accordingly, we, the undersigned Counsel, respectfully move the Court to conduct a *Farett*a hearing at the Court's convenience.

Respectfully submitted,

/s/Tamara S. Sack  
Tamara S. Sack (OSC#71163)  
130 West Second Street, Suite 310  
Dayton, Ohio 45402  
Ph: (513) 225-2887  
[tsacklaw@gmail.com](mailto:tsacklaw@gmail.com)

/s/Paul M. Laufman  
Paul M. Laufman (OSC#66667)  
Laufman & Napolitano, LLC  
4310 Hunt Road  
Cincinnati, OH 45242  
Ph: (513) 621-5563  
[plaufman@In-lawfirm.com](mailto:plaufman@In-lawfirm.com)

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing Motion to Withdraw as Counsel utilizing the United States District Court's E-Filing CM/ECF system on the 21<sup>st</sup> day of December 2020.

/s/Tamara S. Sack  
Tamara S. Sack